

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CORNELL UNIVERSITY,

Plaintiff,

v.

URO MEDICAL CORPORATION,

Defendant.

Case No. 1:22-cv-03772-RA

**DEFENDANT'S RULE 26 INITIAL
DISCLOSURES**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Defendant Uro Medical Corporation (“Defendant”), by and through its counsel, Thompson & Skrabanek, PLLC, provides the following Rule 26 Disclosures to Plaintiff based on the information reasonably available to it at this time. Defendant does not, by making these disclosures, waive any rights or objections that it has with respect to discovery, including its rights to object to discovery on the basis of relevancy, privilege, undue burden, or any other valid ground. Defendant reserves all of its rights to object to the use of any information provided herein, for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action. Defendant reserves the right to supplement or amend these Rule 26 Disclosures.

I. 26(a)(1)(A)(i) Individuals Likely to Have Discoverable Information

Pursuant to Rule 26(a)(1)(A)(i), Defendant identifies the following individuals likely to have discoverable information concerning the subject matter of this litigation:

Although Defendant retains the right to amend this list, Defendant names:

1. Pam Biedleman
c/o Thompson & Skrabanek, PLLC
42 W. 38th Street, Suite 1002
New York, NY 10018

2. Laura Tyler Perryman
c/o Thompson & Skrabanek, PLLC
42 W. 38th Street, Suite 1002
New York, NY 10018
3. Shanice Saunders
c/o Thompson & Skrabanek, PLLC
42 W. 38th Street, Suite 1002
New York, NY 10018
4. Sherri Costa
4008 Eastridge Cir
Pompano Beach, FL 33064-1842
5. Niek Vanquathem
Westkapelse steenweg 63
Brugge 8380
Belgium
6. Michael Baja
(Address Unknown)
7. Rabia Bukhari RN
(Address Unknown)
8. Ahra Cho
(Address Unknown)
9. Alexis Te
(Address Unknown)
10. Bilal Chughtai
(Address Unknown)

II. 26(a)(1)(A)(ii) Description of Documents and Tangible Things

Pursuant to Rule 26(a)(1)(A)(ii), Defendant identifies the following categories of non-privileged documents, and tangible things that are in their possession that Defendant may use to support its claims:

1. All correspondences, e-mails, letter, notes and any other writings between Plaintiff and Defendant and their agents;

2. Computer logs from the Electronic Data Capture (EDC) system;
3. Related source materials and other records gathered pursuant to the Parties' Agreement;
4. All correspondences, e-mails, letter, notes and any other writings between Defendant and government agencies, and their agents and representatives if any, relating to Defendant's application for approval for its relevant medical device.

Defendant reserves the right to supplement this list with relevant documents or tangible things if Defendant become aware of their existence.

III. 26(a)(1)(A)(iii) Computation of Damages

Pursuant to Rule 26(a)(1)(A)(iii), Defendant identifies the following category of damages:

(i) cost of Test Articles provided to Plaintiff pursuant to Section 13.15 of the parties' agreement and (ii) loss of revenue arising from Plaintiff's failure to perform its obligation under the relevant agreement.

IV. 26(a)(1)(A)(iv) Insurance Agreements

Defendant has no applicable insurance agreements to disclose pursuant to Rule 26(a)(1)(A)(iv).

Defendant reserves the right to supplement and/or amend this Amended Rule 26 Disclosure throughout the course of discovery in this matter.

Dated: June 17, 2022
New York, New York

By:



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